

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Megan Nelson on behalf of herself and all
others similarly situated,

CIVIL NO. 15-CV-2661 (SER)

Plaintiffs

v.

BMW Financial Services NA, LLC, d/b/a
Alphera Financial Services, All Wheels
Recovery, Inc., and John Doe Repossession
Agencies 1-10

**STIPULATION FOR
EXTENSION OF TIME
TO ISSUE ACCOUNT CREDITS**

Defendants.

Plaintiff Megan Nelson, on behalf of herself and the Settlement Class (“Plaintiff”),
and defendants BMW Financial Services NA, LLC (“BMW FS”) and All Wheels
Recovery, Inc. (collectively, with BMW FS and Plaintiff, the “Parties”), hereby stipulate
to extend the deadline for BMW FS to issue Account Credits pursuant to the terms of the
Settlement Agreement and in support thereof state as follows:

WHEREAS, on March 8, 2017, the Court issued its Final Approval Order wherein
the Court finally approved the Settlement, including the plan of distribution for the
Settlement Fund (Dkt. No. 68, ¶¶ 6, 8);

WHEREAS, on May 2, 2017, the Court issued an Order on Plaintiff’s Motion for
Attorney’s Fees, Costs and Class Representative’s Incentive Award (Dkt. No. 70);

WHEREAS, pursuant to the terms of the Settlement Agreement and the Court’s
orders, the following deadlines govern distribution of the Settlement Fund:

- June 15 – Deadline for BMW FS to transfer funds to Settlement Administrator for attorney's fees and incentive award;
- June 16 – Deadline for BMW FS to issue Account Credits;
- June 30 – Deadline for BMW FS to transfer all remaining Settlement Funds to Settlement Administrator; and
- July 14 – Deadline for Settlement Administrator to mail cash awards to eligible Settlement Class Members;

WHEREAS, in order to ensure that the Settlement Fund is properly distributed, BMW FS requested that the deadline to issue Account Credits be extended through and until June 30, 2017; and

WHEREAS, to keep the Settlement Class informed of the deadlines, the Parties agree to post an update to the Settlement Website with the upcoming deadlines.

NOW, THEREFORE, the Parties hereby stipulate, through their undersigned attorneys, that the deadline for BMW FS to issue Account Credits be extended through and until June 30, 2017. No other deadlines will be impacted by this Stipulation. The

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Parties further agree to instruct the Settlement Administrator to post an update on the Settlement Website of the upcoming deadlines.

Respectfully submitted,

Dated: June 13, 2017

CONSUMER JUSTICE CENTER, P.A.

By s/ Thomas J. Lyons, Jr.

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ATTORNEYS FOR PLAINTIFF AND THE
SETTLEMENT CLASS

Dated: June 13, 2017

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Dated: June 13, 2017

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